US ERA ARCHIVE DOCUMENT

四四四



098301 SHAUGHNESSEY NO.

REVIEW NO

EEB BRANCH REVIEW

D	ATE: IN	1/29/81	OUT 2/11/81	
FILE OR REG. NO.		81-TX-08		
PETITION OR EXP. P	ERMIT NO).		
DATE OF SUBMISSION		12/30/80		and graph and the state of the
DATE RECEIVED BY H	ED	1/28/81		
RD REQUESTED COMPL	ETION DA	ATE 2/14/81		
EEB ESTIMATED COMP				
RD ACTION CODE/TYP				
DATA ACCESSION NO(PRODUCT MANAGER NO	, D, H, S)	F, (N), R, S Nema	ticide	
	Union Submis	Carbide	ysis in citrus groves	
SHAUGHNESSEY NO. 098301		CHEMICAL, & F (2-methyl-2-(methylabamoyl) oxime)	ORMULATION thio)propionaldehyde O-	% A.I.

I. Introduction

This section 18 is reproposed from the original request of March 4, 1980 and includes actual monitoring data, water quality and soils data, which were previously unavailable.

II. Data Adequacy

Although no data was submitted to EEB, we note that the data referred to above was reviewed by the Environmental Fate Branch (EFB, Carsel, 2/3/81). This data addressed aquatic concentrations of Aldicarb in the appropriate areas, as of September, 1980.

The aquatic hazards relevent to this Section 18 are indicated in previous EEB reviews and memos on this particular case (see review of Bascietto 2/12/80; memo of 2/29/80, Bascietto to Critchlow; memo of 4/80, Bascietto to Critchlow). In particular, the hazards are a result of possible aquatic contamination of the Laguna Madre shrimp fishery, an economically important entity of the Gulf Coastal region.

The water quality and monitoring data which was supposed to address the above concerns (as well as those for ground water contamination) was reviewed by EFB. That branch's review clearly indicates that the monitoring and water quality reports commence in September, 1980 (several months after application of aldicarb to the orange groves). Unfortunately, the most critical period for evaluating the estimated environmental concentrations is the period immediately following application (i.e., Spring, 1980). Elgindi, et al., 1978 (as referenced by Carsel's 2/3/81 review) shows that most aldicarb is dispersed in the immediate post-application period. This period would also coincide with critical reproductive considerations in the fishery of concern. The implication we draw from all of this is that the data reports commencing as of September, 1980 are inadequate to address concerns over citrus tile-drainage effluents and surface runoff routes to the Laguna Madre Bay.

III. Recommendations

EEB has no adequate runoff monitoring data upon which to base a reversal of our previous position on this issue, and cannot make a favorable recommendation for this Section 18. We would, however, be most anxious to review monitoring data taken at the more appropriate time.

EEB does not concur with this Section 18.

John J. Bascietto
Wildlife Biologist, Sec. 3
Ecological Effects Branch/HED

David Coppage Head, Sec. 3

Ecological Effects Branch/HED

Clayton Bushong

Chief,

Ecological Effects Branch/HED